

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

DR. ELVISHA DHAMALA, DR.
SHELLEY FACENTE, DR. ROBERT
MAHON, and DR. LUCINA UDDIN,

Plaintiffs,

v.

ELSEVIER, B.V., INFORMA PLC,
INTERNATIONAL ASSOCIATION OF
SCIENTIFIC, TECHNICAL, AND
MEDICAL PUBLISHERS, JOHN
WILEY & SONS, INC., SAGE
PUBLICATIONS, INC., SPRINGER
NATURE AG & CO KGaA., TAYLOR &
FRANCIS GROUP, LLC, TAYLOR &
FRANCIS GROUP, LTD., WOLTERS
KLUWER HEALTH, INC., WOLTERS
KLUWER N.V., and JOHN DOES 1
THROUGH 50,

Defendants.

Case No. 1:24-cv-06409

**DECLARATION OF RUPERT HOPLEY IN SUPPORT OF IMPROPERLY NAMED
FOREIGN DEFENDANTS' MOTION TO DISMISS PLAINTIFFS' AMENDED CLASS
ACTION COMPLAINT FOR LACK OF PERSONAL JURISDICTION**

I, Rupert Hopley, declare under the penalty of perjury as follows:

1. I am the Company Secretary and General Counsel for Informa PLC. The facts below are based either on my personal knowledge of Informa PLC's, Taylor & Francis Group, Ltd.'s ("T&F Ltd.") and Taylor & Francis Group, LLC's ("Taylor & Francis LLC") corporate structure and operations, or based on my knowledge of these matters following reasonable enquiries.

Background on Informa PLC

2. Informa PLC was incorporated in the United Kingdom in January of 2014, and it is publicly traded on the London Stock Exchange. Informa PLC's registered office is 5 Howick Place, London SW1P 1WG.

3. Informa PLC is a holding company and has no employees.

4. Informa PLC has subsidiaries, structured into four divisions. One of these divisions is referred to as "Taylor & Francis," and the subsidiaries within that division focus on academic research, advanced learning, and open research. Informa PLC does not publish scholarly articles.

5. Each of Informa PLC's subsidiaries are separately incorporated, and each is ultimately responsible for setting its own strategy and operating its own day-to-day businesses.

6. Under this structure, Informa PLC's subsidiaries generate their own revenues and incur their own expenses.

7. Informa PLC maintains its own books and records separately from its subsidiaries.

8. Informa PLC has its own board of directors, which is separate from its subsidiaries who maintain their own executive and senior management teams.¹

9. Informa PLC's subsidiaries are responsible for conducting their own regular board meetings and maintaining board meeting minutes. Informa PLC conducts its own board meetings and maintains its own board meeting minutes.

¹ See, e.g., Informa, *Annual Report 2023* at 91, <https://www.informa.com/globalassets/documents/investor-relations/2024/2023-informa-annual-report.pdf>; Taylor & Francis, *Our Executive Leadership Team*, <https://taylorandfrancis.com/about/executive-leadership-team/>.

Informa PLC Has No Connection with the United States

10. Informa PLC does not have, and to the best of my knowledge never has had, its principal place of business in the United States.

11. Informa PLC does not maintain offices in the United States. Any offices identified under the “Informa” name are either leased or owned by one of its separately operated subsidiaries and not by Informa PLC.

12. Informa PLC has no operations or physical presence in the United States.

13. Informa PLC does not have a designated agent for service of process in the United States.

14. Informa PLC does not have an address in the United States.

15. Informa PLC does not derive, and to the best of my knowledge has never derived, any independent trading income in the United States or elsewhere.

16. Informa PLC does not conduct regular officer or board meetings, or any other regular business meetings, in the United States.

Background on Taylor & Francis Group Limited

17. T&F Ltd. is a wholly owned subsidiary of Informa PLC, is separately incorporated in the United Kingdom, and is organized under its laws.

18. T&F Ltd.’s registered address is 5 Howick Place, London SW1P 1WG.

19. T&F Ltd. is dormant and has filed as a dormant company in the United Kingdom since 2021.

20. T&F Ltd., which was previously known as Taylor & Francis Group PLC, became part of the Informa PLC group of companies in 2004 in connection with the merger between Taylor & Francis Group PLC and Informa PLC.

21. From at least 2006 to 2023, T&F Ltd. acted as an intermediate holding company.

In June 2023, T&F Ltd.'s shareholdings were transferred and today it holds only one nominee share in one entity unrelated to this dispute. T&F Ltd. has no subsidiaries.

22. However, since at least 2006, T&F Ltd. has had no employees, and has derived no independent revenues.

23. T&F Ltd. files its own annual reports each year.

24. T&F Ltd. maintains directors that are distinct from Informa PLC with the exception of one director that also sits on Informa PLC's Board.²

T&F Ltd. Has No Connection to the United States

25. T&F Ltd. does not maintain offices in the United States.

26. Since at least 2005, T&F Ltd. has not operated any independent business or conducted any business on its own anywhere, let alone in the United States.

27. T&F Ltd. has no presence in the United States.

28. T&F Ltd. does not have a designated agent for service of process in the United States.

29. T&F Ltd. does not have an address in the United States.

30. T&F Ltd. does not conduct regular officer or board meetings, or any other regular business meetings, in the United States.

² Taylor & Francis Group Limited, *Unaudited Annual Report and Financial Statements for the Year Ended 31 December 2023* at 2, <https://find-and-update.company-information.service.gov.uk/company/02280993/filing-history>; Informa, *Annual Report 2023* at 91, <https://www.informa.com/globalassets/documents/investor-relations/2024/2023-informa-annual-report.pdf>.

Taylor & Francis Group, LLC Is a Separate Company from T&F Ltd. and Informa PLC

31. Taylor & Francis LLC is a wholly owned subsidiary of Informa PLC. It is not a subsidiary of T&F Ltd.

32. Taylor & Francis LLC was created and separately incorporated after the merger between Taylor & Francis Group PLC and Informa PLC in 2004.

33. Taylor & Francis LLC operates in the United States in connection with its academic publishing business.

34. Taylor & Francis LLC's premises are separate from Informa PLC and T&F Ltd.

35. Taylor & Francis LLC operates its day-to-day business without assistance from Informa PLC or T&F Ltd. This includes having separate payroll systems and HR systems from any such systems of Informa PLC and T&F Ltd.

36. Taylor & Francis LLC has its own executives and officers that are separate from those of Informa PLC and T&F Ltd.

I declare under the penalty of perjury under the laws of the United States of America that
the foregoing is true and correct, pursuant to 28 U.S.C. § 1746.

Dated: May 5, 2025

Respectfully submitted,

DocuSigned by:

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Rupert Hopley

Company Secretary and General Counsel